

1. Identify and describe any portion of the Site or assets at the Site owned, operated, leased, or mined or explored by the Respondent, and the dates during which the Site was owned operated, leased, mined, or explored, including areas where borings were taken and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including but not limited to purchase and sale agreement, royalty payments, deeds, and leases including mining leases, and gravel and tailings leases.
2. Provide a list of customers (e.g., smelters, mills, governments and industries) the Respondent had dealings with, during the years the Respondent had property interests, mine leases, assignments, agreements or arrangements with landowners, at the Site; whether or not mining took place during those years.
3. Provide a description and copies of all records maintained by the Respondent for operations at the Site. Including any records on royalties paid or received from mining activities at the Site.
4. Identify the physical and chemical characteristics of chat piles, slag piles, and tailing ponds, including copies of all current and historical results of analyses performed on these structures and the sampling locations of all such samples.
5. Provide copies of all current and historical laboratory or field analyses of the water quality of the aquifers, mine water, surface water, tailing pond discharges and receiving streams, air quality and soil, including the sampling locations of all such samples.
6. Provide any information and copies of documents in your possession regarding ore production from [DATE] through the present at the Site, including volume/tonnage; listed by year of operation, and the mine and district at which the minerals were produced. Include any information in your possession which may have been filed with or received from the U.S. Bureau of Mines, regarding your company or any other company that held assets at or property interests in the Site.
7. Provide any records on the dewatering of the mines at the Site that provide specific information on pump rates, pump station locations, pump sizes and changes in aquifer piezometric heads, at any and all of the mines at the Site.
8. Identify, describe and provide copies of any documents identifying the location and boundaries (whether exact or not) of mining districts and/or individual mines located within a Site.
9. Provide a description and copies of all records maintained by the Respondent for operations at the Site. Including any records on royalties paid or received from mining activities at the Site.

10. Describe what waste by-product(s) were produced during your operations at the Site.
11. For each waste by-product identified by you, describe what you did with these waste byproducts. Specifically, also describe what you did with:
  - a. uranium protore or uneconomic material
  - b. any listed or unlisted hazardous substances
  - c. dewatering or surface water discharge
12. Provide all documentation which describes how waste by-product was stored, treated, disposed or deposited at the property.
  - a. For each waste by-product identified, provide a map identifying where on the property these wastes were stored, treated, disposed or deposited.
  - b. For each property, identify and describe all reclamation or cleanup efforts made by you to address waste by-products and/or to prevent potential releases of hazardous substances.
13. Identify and provide any and all agreements, consent decrees, licenses, that regard all or a portion of the Site between BP plc, ARCO, Atlantic Richfield Company, or Anaconda Copper Mining Company, and:
  - a. Laguna Pueblo, both the Tribe and individuals
  - b. Bureau of Land Management
  - c. Bureau of Indian Affairs
  - d. U.S. Department of Defense
  - e. U.S. Department of Energy
14. Is [company] the successor to all liabilities, including those under the Comprehensive Environmental Response, Compensation and Liability Act, as amended, by the Superfund Amendments and Reauthorization Act of [affiliated company names]?
15. If your answer to number (1) above is "no", respond fully to the following questions:
  - a. Describe in detail [company]'s past and current relationship with [affiliated company names] and the facility located at [address or name]. Respond, for instance to each of the following questions.
  - b. State the date on which [company] acquired ownership or an interest in [affiliated company names] and the facility. State the prior owners, if any, of [affiliated company names] and the facility. Submit a copy of all documents relating to [company]'s purchase of [affiliated company names] and the facility.
  - c. Did the company sell or otherwise divest itself of any stock, assets, or other interest in [affiliated company names] or any other company which operated a manufacturing facility at (address).

- d. If the answer to (a) is "yes", fully describe the nature of the sale and/or transaction. State if the transaction consisted of a merger, consolidation, sale or transfer of assets, and submit all documents relating to such transaction, including all documents pertaining to any agreements, express or implied, for the purchasing corporation to assume the liabilities of the selling corporation.
  - e. Did [company name] retain the liabilities of the [affiliated company names] for events prior to the sale?
16. Describe the relationship between BP and the following:
- a. ARCO
  - b. Anaconda Copper Mining Company
- 17.